

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

RONALD SHAMON and  
PATRICIA SHAMON,  
  
Plaintiffs  
  
v.  
  
UNITED STATES OF AMERICA,  
  
Defendant.

**PLAINTIFF’S MOTION TO EXTEND DEADLINE FOR TAKING EXPERT  
DEPOSITIONS**

Now comes the Plaintiff, Ronald Shamon, and moves this honorable Court for an order extending the deadline for taking expert depositions, currently set to expire on September 15, 2005, up to and including October 5, 2005.

In support of this motion, the Plaintiff states the following:

1. This is a medical malpractice action in which the Plaintiff alleges that he was negligently treated while a patient at the Defendant hospital. Plaintiff further alleges that he sustained severe and permanent damage as a direct result of the Defendant's negligence. The Defendant denies these allegations.

2. The deadline for taking expert depositions, established by the Court at the initial scheduling conference, is currently set to expire on September 15, 2005.

3. Prior to the expiration of the September 15 deadline, Plaintiff's counsel contacted defense counsel, and informed him of Plaintiff's intent to take the deposition of Dr. James

Richter, one of the Defendant's medical experts. Unfortunately, due to certain scheduling conflicts, the parties were unable to schedule Dr. Richter's deposition prior to the expiration of the September 15 deadline established by the Court.

4. In light of the foregoing, Plaintiff respectfully requests that the Court extend the deadline for taking expert depositions up to and including October 5, 2005.

5. The Defendant does not oppose this motion.

Respectfully submitted,

RONALD SHAMON and  
PATRICIA SHAMON,

/s/ Michael R. Perry  
Michael R. Perry (BBO #555300)  
Halye A. Sugarman (BBO #646773)  
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DATED: September 14, 2005  
437331

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# CERTIFICATE OF SERVICE

I, Michael R. Perry, hereby certify that I have this day served ***Plaintiff's Motion to Extend Deadline for Taking Expert Depositions*** on the following by hand delivery:

Damian W. Wilmot  
Assistant U.S. Attorney  
U.S. Attorney's Office  
Department of Justice  
John Joseph Moakley Federal Courthouse  
One Courthouse Way, Suite 9200  
Boston, MA 02210

/s/ Michael R. Perry  
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DATED: September 12, 2005  
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